

Consolidated Smart Broadband Systems, LLC

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2018 covering the prior calendar year 2017

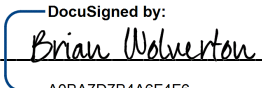
1. Date filed: February 23, 2018
2. Name of company covered by this certification: Consolidated Smart Broadband Systems, LLC
3. Form 499 Filer ID: 832289
4. Name of signatory: Brian Wolverton
5. Title of signatory: Chief Technology Officer
6. Certification:

I, Brian Wolverton, certify that I am an officer of the Company named above, and acting as an agent of the Company, that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 CFR § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the Company's procedures ensure that the Company follows the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The Company has not taken any actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The Company has not received customer complaints in the past year concerning the unauthorized release of CPNI.

Signed: _____
DocuSigned by:

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Attachment: Accompanying Statement Explaining CPNI Procedures

Consolidated Smart Broadband Systems, LLC

Certification Statement of Compliance

1. Consolidated Smart Broadband Systems, LLC ("Consolidated") is an interconnected VoIP provide, subject to the requirements set forth in Section 64.2009 of the Federal Communications Commission's ("FCC's") rules. Consolidated has established policies and procedures to satisfy compliance with the FCC's rules pertaining to use, disclosure and access to customer proprietary network information ("CPNI") set forth in sections 64.2001 et. seq.
2. Consolidated recognizes that CPNI includes information that is personal and individually identifiable, and that privacy concerns have led Congress and the FCC to impose restrictions upon its use and disclosure, and upon the provision of access to it by individuals or entities inside and outside Consolidated.
3. Consolidated currently does not use, disclose, or permit access to CPNI for marketing of any sort, or for any purpose requiring prior customer approval. Nor does Consolidated provide information available for sale or use by any outside company pertaining to Consolidated's Customers.
4. Consolidated has designated a CPNI Compliance Officer who is responsible for: (1) communicating with Consolidated's attorneys, consultants, and employees regarding CPNI responsibilities, requirements and restrictions; (2) receiving, reviewing and resolving questions or issues regarding use, disclosure, distribution or access to CPNI. Consolidated personnel are trained to escalate any request for, or concern related to, CPNI to Consolidated's CPNI Compliance Officer.
5. Consolidated currently does not make CPNI available through customer-initiated telephone contact, in any form online via the Internet, or through in-store visits. In the event a Customer requests information that includes CPNI, Consolidated's CPNI Compliance Officer will verify the request and then send the information to the address of record.
6. Consolidated takes reasonable measures to secure any information pertaining to customer accounts, including individually identifiable CPNI. There has been no access authorized or unauthorized by any parties to obtain any customer information, including CPNI. Nevertheless, policies are in place to ensure that law enforcement and affected customers are timely notified of a breach of customers' CPNI as the FCC's rules require.
7. Should Consolidated change any of this policy, Consolidated will update its CPNI compliance policies consistent with FCC rules.